

EXHIBIT 2

IN THE CIRCUIT COURT OF BARBOUR COUNTY, ALABAMA

JOHNNY W. SASSER,

Plaintiff,

VS.

**RYDER TRUCK RENTAL, INC., d/b/a
DEDICATED LOGISTICS INC., a/k/a
INTEGRATED LOGISTICS, INC. Et al.
Defendant.**

CASE NO: CV-1997-01

PLAINTIFF'S ANSWER TO DEFENDANT'S INTERROGATORIES

COMES now the Plaintiff and in response to the Defendants's Interrogatories, states as follows:

1. Johnny Wanza Sasser
03-24-1951
417-70-8840
AL DL# 2798002
8218 Highway 51 N
Ariton, AL 36311
2. No
3. Wallace B. McGahan, M.D.
1983-2004
Clio, AL-Worker's Comp Doctor
Back, spasms, cramps, flu, heart

Mellanie Benton, M.D. (Deceased)
1995-2000
Montgomery, AL
Back

Hugh McGuire, M.D.
The Family Doctor
Montgomery, AL
(Neurological problems referred to Alan Prince M.D., Dothan)

Alan Prince, M.D.

1996

Dothan, AL

Sleep Study

Ronald Alfano, M.D.

1997-1998

Heart

Carl Barlow, M.D. (ER Doctor)

1997

Ozark, AL

Injury-Fall

David Claasen, M.D.(Office)

1998

Ozark, AL

Heart

Connie Richardson, M.D. (ER)

1998

Ozark, AL

Complications following open-heart surgery

Luna Sy, M.D.

1996-1997

Clio, AL

Basic Care

Keith Granger, M.D.

1995-2006

Southern Bone and Joint, Dothan, AL

Knees, falls, carpal tunnel (both hands), knee surgery (both knees)

Robert Allen, M.D.

1996-1997

Dothan, AL

Hands, back, legs

Marvin W. Sexton, M.D.

2005-2006

Pulmonary Asso., Dothan, AL

Emphysema, COPD

Darius G. Aliabadi, M.D.
2005-2006
Heart South, Dothan, AL
Heart

John J. Marsella, M.D.
2000-2004
Southeast Pain Mgt. Center, Dothan, AL
Pain, leg cramps, back spasms, neck, hands, feet

Steven R. Beranek, M.D.
Wiregrass Orthopaedics, PC, Ozark, AL

Charles A. Wood, M.D.
218 Hospital Ave., Suite A
Ozark, AL
Back spasms, cramps, neck, hands, knees

4. UAB, Birmingham, AL
Albert C. Pacifico, M.D.
April, 1998
Open-heart surgery following heart attack

Dale Medical Center, Ozark, AL
November, 1998
Congestive heart failure

5. Objection, immaterial and irrelevant. The underlying worker's compensation case has been settled between the parties and is no longer the "basis" for this action. It is the future medical treatment that is at issue.

6. Frequent falls (approximately twice weekly) due to leg weakness and numbness, sharp pains in back, lose control of legs.

Poor circulation in legs causing leg cramps and spasms, numbness in arms, difficulty sleeping due to pain.

Knee injury (July, 2005) due to falls, weak legs

Hand injury—Carpal tunnel, neuropathy poor circulation, numbness in arms and hands, carpal tunnel surgery (1996)

Several times treated in ER for falls, injury.

7. Back—numbness, pain.
- Legs—numbness, poor circulation, poor control, limited mobility
- Hands—Carpal tunnel (both), difficulty holding onto anything, drop things
- Sleeping—Difficulty due to pain
- Incontinence—Due to spinal canal stenosis, frequent “accidents” daily (8 movements daily)
- Uses a rope to pull up out of bed, not able to cook, do laundry, clean. Can still do dressing with help, can feed self, drops things.
8. Robert Allen, M.D., Neurologist, Dothan, AL
Injections—side, back and legs
- Dale Medical Center, ER, Ozark, AL
- Wallace B. McGahan, Clio, AL
Muscle relaxers, and sleep medicine
- Mellanie Benton, M.D., Montgomery, AL
Injections (Back)
- John J. Marsella, M.D., Dothan, AL
Pain medication
9. I did not go to doctor/hospital when I have needed pain treatment or medication because the Defendant cut off my future medical treatment. I paid Dr. McGahan out-of-pocket myself.
- June of 2004, Ryder stopped paying Pain Management Clinic, after paying since 2001. I was taking 40mg. Oxycontin three times a day. When Ryder suddenly stopped paying, I was left to suffer withdrawal on my own. I should have been hospitalized and helped with the withdrawal. For three weeks I lay in hospital bed at home in cold sweats, unable to eat, taking bottles of nitro tablets (20 a day), vomiting, diarrhea, cramps, thinking that I was dying.
10. Clio Drugs—Clio Pharmacy, P.O. Box 460, Clio, AL 36017, (334) 397-2029
Paid approximately \$700.00 for Plavix which Dr. McGahan prescribed for circulation
- SAMC, Dothan, AL, \$2,300.00, Pain Management Center—injections
When Martye Lloyd took over as my rep (about 2002) she went back, disapproved several of my medicines (Center Drugs, Ozark, AL) that had been filed and left a bill

of over \$10,000.00 for me to pay.

11. a. In 2004, (phone conversation) Martye Lloyd said, "You have cost Ryder a lot of money over the years—in fact, you have cost Ryder an awful lot of money over the years. I am going to try to get it stopped legally through Alabama Workers Comp laws."

I said, "You may can get a prescription cut off but there is no way you can get it cut off (Workers Comp) because two circuit judges ordered it for life."

- b. April or May, 2004 (phone conversation #2)—Martye Lloyd sent a letter about peer review (from Texas) and I called and asked for explanation:

ML: "You have to each time call in and get pre-certified before you see the doctor. If you don't get pre-certified, I will not pay it."

JS: "But you have paid it in the past and I did not have to call Texas and get it pre-approved."

- c. June, 2004, (phone conversation #3)—In response to letter June 17, 2004 from Ryder (Martye Lloyd) I called her.

JS: "I will try to get the nurses or doctors to make my appointments."

ML—"It (letter) is self-explanatory. If you don't get it pre-approved, Ryder will not pay."

- d. July 2004, (phone conversation #4)—I called Dr. Marsella's office and talked with Brenda to question about why Ryder did not pay for trigger-point injections.

Brenda: "Martye Lloyd said she needed four days to have her doctors review your file."

- e. July 12, 2004, (phone conversation #5)—I called Martye Lloyd.

JS: "What is the problem with my getting my medicine."

ML: "We have filled your medicine for the last time. This is your last month."

JS: "You can't do this because of the circuit judge's order."

ML: "My peer reviews with Intra Corp of Texas haven't been appealed by any of your doctors so you are cut off through Alabama Worker's Comp. at Montgomery."

- f. July 5, 2005, (phone conversation) Following a fall on July 1, 2005, I called

Martye Lloyd about re-instating worker's comp. and getting a worker's comp doctor. She was on vacation so they transferred me to her assistant, Sandi Tifton, who told me I had been cut off a year earlier by Alabama Worker's Comp.

JS: "I have not received any notice from Alabama Worker's Comp. I need to speak with a supervisor."

Sandi Tifton transfered me to Greg Pitts, Supervisor. I explained my situation—my worker's comp doctor had moved, I had no worker's comp doctor, gave him Dr. Wood's phone # and address as well as Dr. Marsella's phone # and address.

GP: "I will start working on getting you a worker's comp doctor and get you set up with the pain clinic. Give me two days to get up with them."

g. July 8, 2005, (phone conversation)—I called and asked about Greg's progress.

GP: "I have called and left a message with each doctor. You know how doctors are. They are sometimes slow about getting back with you. I will call again."

I checked at Dr. Wood's office and Greg Pitts had not called.

h. July, 2005-Monday a.m.—(phone conversation)—I called Martye Lloyd and told her about conversations with Greg Pitts while she was out on vacation.

ML: "Mr. Pitts (Greg) did not know how to pull up your records. He was trying to help you but he didn't know you had been cut off. You have been cut off by peer review by Intra Corp. You are old now and you have cost Ryder a lot of money."

JS: I told her about medical conditions.

ML: "Half the people who work in this office have the same things—a degenerative disk disease, and don't know it."

JS: "If they had what all I have (degenerative disk disease, bulges, canal stenosis, and arthritis) they'd know it."

ML: "I have talked with you several times, and you have left messages when you had slurred speech and I could not understand what you were saying and I could tell you were drugged up. I just hope you were not driving a vehicle where some innocent person could be hurt."

JS: "I took only what was prescribed by the doctors and I was tested by the pain clinic on a regular basis to see if I was taking anything else. Young Lady, I have driven millions of miles with no accident. I still have my CDL. I want a Worker's Comp doctor."

ML: "You were cut off a year ago."

JS: "Send me a letter stating that I had no Worker's Comp doctor to appeal it, but you have to go by the ruling of the courts."

ML: "It doesn't matter what the judges say, my peer reviews will hold up because no doctors appealed."

k. August, 2005, (phone conversation)—I called Martye Lloyd.

JS: "I need the date I was cut off and the reason. Would you mind writing me a letter telling me when?"

ML: "Yes, I will send that to you. If we owe any back bills, except Pain Clinic, tell me and we will pay that."

JS: "You remember several months ago or maybe a year ago, you told me you were going to get me cut off legally and I guess you did."

ML: "Yes, I did my job."

12. July 2004, I called Dr. Marsella's office and talked with Brenda to question about why Ryder did not pay for trigger-point injections.

Brenda: "Martye Lloyd said she needed four days to have her doctors review your file."

13. July 1, 2005—Fall due to back and leg numbness, fell forward onto both knees.

ER—Dale Medical Center, Ozark AL

MRI—Dr. Beranek, one leg, referred to Southern Bone and Joint, Dothan, AL

SAMC—Dr. Granger, December 2005, two surgeries

14. Worsening arthritis of the knees, torn cartilage in both knees, constant pain in knees and legs and numbness of lower part of legs and feet.

15. Norma Sasser, Wife
8218 Highway 51
Ariton, AL 36311

16. Dr. Charles Wood
218 Hospital Ave. Suite A
Ozark, AL 36360
(334) 445-2410

Dr. Keith Granger
Southern Bone and Joint
1500 Ross Clark Circle
Dothan, AL 36303
1-800-460-2663

Steven R. Beranek, M.D.
Wiregrass Orthopaedics PC
Ozark, AL 36360-519 Lee St., Enterprise, AL
1-888-351-2663

519 Lee St.
Enterprise, AL
(334) 347-9590

Carl Barlow, M.D.
ER-Dale Medical Center
Ozark, AL 36360
(334) 774-2601

John J. Marsella, M.D.
SAMC-Pain Management Clinic
1108 Ross Clark Circle
Dothan, AL 36301
(334) 793-8196

All others listed above that took part in conversations with the Plaintiff. Plaintiff agrees to supplement this response when discovery has been conducted.

17. Unknown at this time. Plaintiff agrees to supplement this response when discovery is completed.

18. Unknown at this time. Plaintiff agrees to supplement this response when discovery is completed.

Dated this the 26 day of May, 2006.

Johnny W. Sasser
Johnny W. Sasser

STATE OF ALABAMA,
HOUSTON COUNTY.

Before me, the undersigned authority, personally appeared Johnny W. Sasser, and, who being by me first duly sworn according to law, deposes and says that the statements contained in the foregoing are true and correct to the best of his information, knowledge, and belief.

This the 26th day of May, 2006.

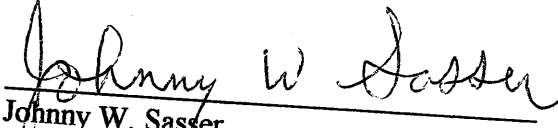
Kimberly Galle
NOTARY PUBLIC
My Commission expires: 10-28-09

PLAINTIFF'S ANSWER TO DEFENDANTS REQUEST FOR PRODUCTION

COMES now the Plaintiff and in response to the Defendant's Request for Production of Documents, states as follows:

1. Documents created or produced by the Defendant are in the control and possession of the Defendant.
2. Those documents can be obtained directly from Dr. Marsella's office.
3. The Plaintiff is not in possession of his medical records at this time. When he obtains those records, they will be sent to the Defendant.
4. The Plaintiff's medical records prior to the Settlement Agreement are in the possession of the Defendant. As to his records after the Settlement Agreement, see response to #3 above.
5. See #4.
6. See #3.
7. See #3.
8. None
9. Attached.
10. See #3.

11. Attached.
12. None exist that I am aware of.
13. Attached.
14. None exist that I am aware of.
15. See #3.
16. See #3.
17. See #3.
18. Attached.
19. The Defendant is in possession of the Settlement Agreement and Order. Attached.
20. Objection. Immaterial and irrelevant to the issue of whether the Defendant should pay my medical bills.
21. Objection. Immaterial and irrelevant to the issue of whether the Defendant should pay my medical bills.
22. See #21.
23. None in my possession at this time. Plaintiff will supplement this response once documents are received.
24. None
25. Attached.
26. Unknown at this time. Plaintiff will supplement this response once discovery is conducted.
27. Unknown at this time. Plaintiff will supplement this response once discovery is conducted and an expert has been identified.
28. None.


Johnny W. Sasser

Sworn to and subscribed before me this the 26th day of May, 2006.

Kimberly Galle
NOTARY PUBLIC

My Commission expires: 10-28-09

Amy M. Shumate
Amy M. Shumate (SHU015)
Attorney for the Defendant
519 S. Oates Street
Dothan, Alabama 36301
(334)673-0729

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing to William A. Austill, Attorney for Defendant, Austill, Lewis & Simms, 2101 Highland Ave. South, Suite 500, Birmingham, AL 35205-1927, by placing a copy of the same in the United States Mail, postage prepaid and properly addressed, this the 26 day of May, 2006.

Amy M. Shumate
Amy M. Shumate